

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR  
PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17-BK-3283-LTS

**INFORMATIVE MOTION  
REGARDING ATTENDANCE AT DISCLOSURE STATEMENT HEARING**

PLEASE TAKE NOTICE that, pursuant to this Honorable Court's *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* filed on October 14, 2021 [Dkt. No. 18502], Vaquería Tres Monjitas, Inc. ("VTM"), hereby respectfully informs as follows:

1. The Oversight Board and VTM have engaged in good faith negotiations regarding, among other things, (a) allowance of VTM's Dairy Producer Claim (as defined in the Plan), (b) treatment of the VTM Dairy Producer Claim under the Plan, and (c) clarification that the Plan and proposed Confirmation Order will not affect or diminish the terms and conditions of the Dairy Producer Settlement (as defined in the Plan) other than the Commonwealth's obligation to pay certain amounts pursuant to paragraph 14 of the Dairy Producer Settlement.

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

2. While VTM is in the process of confirming the negotiated resolution with counsel to the Oversight Board, it files this Informative Motion out of an abundance of caution.
3. Wendy G. Marcari of Epstein Becker & Green, P.C. and Gerardo A. Carlo Altieri of G. Carlo-Altieri Law Offices, LLC, will appear on behalf of VTM at the Confirmation Hearing. The Party Appearance Sheet, Witness Cover Sheet, and Exhibit Cover Sheet are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively.
4. VTM intends to present opening argument in opposition to confirmation of the Plan of Adjustment.
5. VTM does not contend there is a disputed material factual issue and does not intend to cross-examine any declarant or to present live rebuttal testimony at the Confirmation Hearing.
6. VTM reserves its right to be heard on any matter presented to the Court, including, but not limited to, the Reservation of Rights of VTM with respect to Seventh Amended Plan of Adjustment (Dkt. No. 18637), and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of VTM.

**WHEREFORE**, counsel, on behalf of the VTM, respectfully requests this Honorable Court to take notice of the information stated above.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 27<sup>th</sup> day of October 2021.

**WE HEREBY CERTIFY** that on this same date the foregoing Informative Motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

**G. CARLO-ALTIERI LAW OFFICES, EPSTEIN BECKER & GREEN, P.C.  
LLC**

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*Attorneys for Vaquería Tres Monjitas, Inc. Attorneys for Vaquería Tres Monjitas, Inc.*

**Exhibit A**

**Party Appearance Cover Sheet**

Name of Party	Vaquería Tres Monjitas, Inc.
Party Name Abbreviation	VTM
Pretrial Conference and Confirmation Hearing Participant	Gerardo A. Carlo-Altieri <a href="mailto:gacarlo@carlo-altierilaw.com">gacarlo@carlo-altierilaw.com</a> G. Carlo-Altieri Law Offices, LLC 787.247.6680 Docket No. 16982 Zoom Screen Name: Gerardo Carlo Participating in the Confirmation Hearing
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"><li>• Name,</li><li>• Email,</li><li>• Law Firm,</li><li>• Phone Number, and</li><li>• Docket No. for the Attorney's Notice of Appearance</li><li>• Zoom Screen Name</li><li>• Is the attorney participating in the Pretrial Conference or the Confirmation Hearing or Both?</li></ul>	Wendy G. Marcari <a href="mailto:WMarcari@ebglaw.com">WMarcari@ebglaw.com</a> Epstein Becker & Green, P.C. 212.351.3747 <i>Pro Hac Vice</i> Docket Nos. 16985, 17049 Zoom Screen Name: Wendy Marcari Participating in the Confirmation Hearing
Plan Objection Docket No.	Docket No. 18637
Witness List Docket No.	N/A
Exhibit List Docket No.	N/A
Other Statement Docket No.	N/A

**Exhibit B**

**Party Witness Cover Sheet**

Name of Party	Vaquería Tres Monjitas, Inc.
Does the Party intend to offer a witness?	No, VTM reserves its right be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of VTM.

**Exhibit C**

**Party Exhibit Cover Sheet**

Name of Party	Vaquería Tres Monjitas, Inc.
Does the Party intend to offer evidence?	No, VTM reserves its right be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of VTM.